

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DARREN CUFF,

Plaintiff,

v.

TRANS STATES HOLDINGS, INC.,
TRANS STATES AIRLINES, GOJET
AIRLINES, and ED TROWBRIDGE,
individually,

Defendants.

Judge Leinenweber
Magistrate Judge Cole

No. 10 CV 01349

**PLAINTIFF'S MOTION FOR ATTORNEYS' FEES AND
RELATED NON-TAXABLE EXPENSES**

Plaintiff Darren Cuff, by and through his attorneys, Caffarelli & Siegel Ltd., and pursuant to 29 U.S.C. § 2617(a)(3), Fed. R. Civ. P. 54, and Local Rule 54.3, respectfully moves this Court to award him \$366,218.55 in attorneys' fees and non-taxable expenses.

On February 28, 2012, a federal jury found in favor of Cuff on his claim of interference in violation of the Family and Medical Leave Act, against Defendants Trans States Holdings, Inc., Trans States Airlines, GoJet Airlines, and Ed Trowbridge. Through the instant Motion, Cuff seeks the award of his attorneys' fees and expenses.

In support of this Motion, Cuff submits an accompanying Memorandum of Law with multiple supporting exhibits. For the reasons set forth in the accompanying Memorandum of Law, Cuff seeks \$366,218.55 in attorneys' fees and non-taxable expenses.

WHEREFORE, Plaintiff Darren Cuff respectfully requests that this Honorable Court grant his motion for attorneys' fees and related non-taxable expenses, and grant him all other relief deemed just.

Dated: May 25, 2012

Respectfully submitted,

Alejandro Caffarelli
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DARREN CUFF

By: /s/ Alejandro Caffarelli
Attorney for Plaintiff

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that he caused a copy of the attached, **Plaintiff's Motion for Attorneys' Fees and Related Non-Taxable Expenses**, to be served upon the party below by electronically filing with the Clerk of the U.S. District Court of the Northern District of Illinois on May 25, 2012.

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Vice President & General Counsel
Trans States Holdings, Inc.
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A courtesy copy was delivered to the chambers of Judge Leinenweber via hand delivery within 24 hours of e-filing.

/s/ Alejandro Caffarelli
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